BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

Investigation Into The Operational Support Systems :
Of Ameritech Wisconsin   :   Docket No. 6720-TI-160

STATEMENT OF PRINCIPLES

THIS STATEMENT OF PRINCIPLES is entered into this 24th day of February, 2000, between Ameritech Wisconsin and the Parties of Record (collectively "The Parties"), including competitive local exchange providers ("CLECs").

WHEREAS on December 15, 1999, the Public Service Commission of Wisconsin ("Commission") issued a Notice of Proceeding and Investigation initiating this docket, the purpose of which is to investigate the Operational Support Systems of Ameritech Wisconsin;

WHEREAS on January 11, 2000, a prehearing conference was held in this docket, at which time Ameritech Wisconsin offered to submit to the Parties of Record on January 28, 2000, a written proposal detailing how, in its view, the investigation of Ameritech's OSS systems should proceed, and the Parties agreed to convene a two-day technical conference to discuss the proposal;

WHEREAS Ameritech did submit the proposal to the Parties of Record, and recommended that the Commission join other Commissions in the Ameritech region to supervise an independent third party multi-state test of its region-wide Operational Support Systems ("OSS") and its performance results;

WHEREAS the parties held a two-day, Staff-led technical conference on February 3 and 4, 2000 to discuss the proposal;

WHEREAS as a result of the technical conference, The Parties reached certain agreements and understandings; and

WHEREAS the parties desire to memorialize their understandings;

NOW, THEREFORE, the parties agree as follows:

1. The purpose of this proceeding is to evaluate the quality, timeliness and completeness of Ameritech Wisconsin's OSS used to support the CLECs seeking to enter the local markets currently served by Ameritech. In addition, this proceeding will test the change management procedures and testing environment(s) utilized with and available to CLECs when Ameritech Wisconsin institutes changes to its OSS. In order to accomplish these goals, the following issues will be investigated: the systems Ameritech Wisconsin currently has in place for pre-ordering, ordering, provisioning, maintenance and repair, and billing; the problems CLECs are experiencing with Ameritech's current systems, how

they can be fixed, and what systems improvements and enhancements are needed; what enhancements to the existing systems need be made prior to 3rd party testing; the design of a third-party OSS test, including what systems should be tested and when; the performance measures necessary to accurately monitor the performance delivered to CLECs, including but not limited to the areas monitored, metric definition and associated business rules; the accuracy, completeness and timeliness of all performance related data collection, computation, reporting and data retention/integrity; and, the adequacy of and adherence to change management procedures. It is the position of some of the parties that an issue in this proceeding is whether Ameritech Wisconsin's OSS represent the best available technology, both in the SBC systems and generally among ILECs. The parties acknowledge that the outcomes of this proceeding may be used by the parties in connection with a Section 271 application by Ameritech Wisconsin.

2. Ameritech will come forward with a plan for future enhancements to its OSS, timeframes for implementation of those enhancements, as well as proposed performance measures for those enhanced systems. After presentation of the plan, CLECs will be provided a reasonable opportunity to identify and prioritize these future enhancements for discussion and resolution in the Forum process. The Forum should begin meeting as soon as possible. Ameritech will provide a proposed test plan and expected pre-test OSS changes to the Forum. All proposals will be open for discussion in the Forum.

3. Ameritech agrees that, at a minimum, certain enhancements to the existing products, processes, or OSS need to be made prior to beginning third party testing. The specific enhancements to be made prior to beginning any portion of third party testing is an issue that must be discussed and resolved in the Forum process. These product and system enhancements to be discussed and resolved in the Forum process include, but are not limited to:

A. A new loop assignment process, including voice grade loops served through integrated digital loop carrier equipment as well as xDSL loop prequalification processes. No plans currently exist to provide these functionalities to CLECs who do not use an Electronic Data Interchange system ("EDI"); however, Ameritech will work with the Forum process to discuss and develop means to make these functionalities available to non-EDI CLECs.

B. A process to order unbundled network element platform ("UNE-P") in commercial volumes for both business and residential customers. No plans currently exist to provide any functionalities to CLECs who do not use an EDI system; however, Ameritech will work with the Forum process to discuss and develop means to make these functionalities available to non-EDI CLECs.

C. An ordering process for adding ADSL functionality to a voice local loop.

D. A process to order sub-loop unbundling.

E. A process to order dark fiber.

F. A new firm order confirmation process – including a new order jeopardy notification process for both EDI and non-EDI CLECs.

G.   Fail safe Hot-Cut procedures with dial tone and ANI testing completed 48hrs. prior to cut.
H.   The Street Address Guide ("SAG") and Customer Service Record ("CSR") will be synced up. (In other words, CSRs will be compared to the SAG, and errors in the CSRs will be corrected).
I.   Parsed CSRs will be provided.
J.   Implement industry standard versions of EDI (Version 10) and LSOG (Version 4) for ordering, including all associated functionalities by August, 2000.
K.   Implement an industry standard version of LSOG (Version 4) for preordering.

Ameritech has also agreed to implement a 10-digit trigger for number portability purposes on April 1, 2000.

As with all other disputes, any issues which are not resolved by agreement of the parties shall be resolved by the Commission.

4. As a baseline or starting point for the Forum process, the performance measures, including all the definitions, exclusions and associated business rules, as adopted by the Public Utility Commission of Texas in July 1999 will serve as the basis for monitoring support delivered to CLECs operating in Wisconsin. The Parties agree to expeditiously work together as a part of the Forum process on what additions to these performance measurements should be implemented prior to conducting a third party test of Ameritech's OSS.

5. Prior to commencing the third-party test, Ameritech agrees, at a minimum, to expand the Texas performance measures to include xDSL loop performance measures, as well as other new performance measures focusing on new products, including UNE-P. The third party test will also include measures for jeopardy, held orders, change management, and "hot cuts", as well as new systems put into place as a result of the Forum process or Commission direction. The specifics of these new performance measurements, business rules, and calculations shall be the product of the Forum process, and to the extent possible, mutual agreement between Ameritech and the CLECs, and shall be established before the third party test is commenced. The CLECs agree that establishing a penalty plan is an essential part of the Forum process. Ameritech believes that establishing a penalty plan is part of a Section 271 process. Where agreement is not reached, the areas of disagreement shall be presented to the Commission, which shall make a final and binding decision. Ameritech also agrees that to the extent it had agreed to a parity or benchmark measure, including any subsequent modifications, in another state, it will import that benchmark or parity measure or modification to Wisconsin.   To the extent both a parity standard and a benchmark standard are employed in other states where Ameritech is a local exchange carrier, the Commission shall determine which standard is applicable in Wisconsin.

6. A Forum shall be convened to facilitate discussion and resolution of the issues set forth in this Statement of Principles. The Parties contemplate participation in the Forum by representatives from the Commission(s), the third-party testing agent or some other consulting agent, and interested representatives from Ameritech Wisconsin and the CLEC community. The Wisconsin Commission shall in all events retain full authority to ensure that the test is designed and conducted, and the results are evaluated, in accordance with the needs of the Commission.

7. The Parties agree that the Commission should hire, at Ameritech's expense, an independent third-party to conduct a comprehensive test of the Operational Support Systems of Ameritech Wisconsin to begin once the necessary system improvements as determined by the Forum process have been implemented. The Parties also agree that a mutually agreed upon entity other than the third-party tester should be retained to act as a pseudo-CLEC. To the extent determined by the Forum, the pseudo-CLEC shall build the OSS interfaces necessary, as determined in the Forum process, to determine whether Ameritech Wisconsin's systems and documentation are sufficient to permit CLECs to develop their OSS in order to enter the market. Ameritech shall provide no greater guidance and information to the pseudo-CLEC than that currently made available to any other CLEC operating within the state.

8. The Parties agree that a suitably qualified entity, as mutually agreed to by the Parties, should be the third-party testing agent. An expedited interview process to select the third party tester shall be conducted by the Forum. Such third party testing agent shall not have an existing or pending disqualifying business conflict with SBC/Ameritech, including any subsidiaries or affiliates. Although Ameritech Wisconsin will be paying all costs for the test, including the cost of the pseudo-CLEC, the Parties agree that the third party testing agent and the pseudo-CLEC shall take their direction exclusively from the Commission or the Forum. The Parties agree that the third party testing agent and the firm to act as the pseudo-CLEC should be promptly retained.

9. The test should be modeled after and based upon the best aspects of the test plan and tests conducted in other states, including, but not limited to, the plan and tests conducted on behalf of the Pennsylvania Public Utilities Commission, the New York Public Service Commission, and the Florida Public Service Commission to test the OSS of Bell Atlantic Pennsylvania, Bell Atlantic New York, and Bell South (Florida), and will take into account the needs of providers in Wisconsin, as agreed to by the Forum or as determined by the Commission.

10. The test, using commercial volumes and capacity testing as determined by the Forum, shall be conducted military style (test until pass). Testing for a scenario is not considered completed in a satisfactory manner until such time as the performance meets or exceeds performance standards established for the relevant metrics in advance of initiation of testing. All corrective actions shall be subjected to retesting.

11. In addition to other guarantees for an open process embodied in this Statement of Principles, the CLECs shall: (1) have the opportunity to verify what is being

tested; (2) receive a list of all documentation that Ameritech provides to the third party tester; and (3) be permitted to verify that the pseudo-CLEC is using the same information that Ameritech provides to the CLECs.

12. Carrier-to-carrier testing using commercial volumes, friendly testing of lines into a central location as requested by a CLEC, and capacity testing as determined by the Forum will be performed. Certain parties suggest that friendly testing involves the testing of up to 1,000 lines. The Forum will determine the exact number of lines that should be part of any friendly test.

13. Ameritech represents that it desires to have its OSS tested on a region-wide or multi-state basis. While some of the Parties of Record have indicated interest in the approach, they await assurances that such a test would ensure that the OSS will function at acceptable performance levels for commercial volumes throughout the region, given Ameritech's legacy "back-office" systems which exist throughout the region and provisioning variances by state. Some parties also assert that Wisconsin-specific testing, as well as results comparisons with SBC/Ameritech's Wisconsin retail channel and individual affiliates, will be necessary in any multi-state testing platform. CLECs desire demonstrations that all order types flow into and through the SBC/Ameritech OSS systems successfully in each participating state.

14. Any issues not resolved in the Forum process by agreement of the parties shall be resolved by the Commission. Parties to P.S.C.W. Docket No. 6720-TI-160 may bring to the Commission for resolution disputes that cannot be mutually agreed to in the Forum process. The Parties of Record reserve the right to escalate issues, wherever raised in the Forum process, to the Commission for resolution by whatever lawful process the Commission determines to be appropriate. If the Commission does not resolve the issue at an earlier date, the issues shall be presented to the Commission in an evidentiary hearing, tentatively scheduled for July 18, 2000.

15. The Parties agree that this Statement of Principles allows the parties to advocate in this proceeding, including during the Forum process, additional issues, such as more OSS system enhancements, along with associated performance measurements, and necessary modifications to any third-party tests. Not addressing any particular issue in this Statement of Principles therefore should not be taken to mean acquiescence with the position of any other party.

Dated: February __, 2000

    Signed: _____

    Printed Name: _____

    Representing: _____